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July 21, 2025

**VIA ECF**

Chief Judge Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Lewis v. Children of Promise Wellness Group LLC*; E.D.N.Y No.: 1:25-cv-01811-(MKB)

Dear Judge Brodie:

As you know, we represent Defendant Children of Promise Wellness Group LLC, (“Defendant”), in the above-referenced matter. We write, jointly with counsel for Plaintiff Tracey Lewis (“Plaintiff”), to respond to the Court’s Order directing the Parties to meet and confer to discuss a briefing schedule for Plaintiff’s Amended Complaint and for Defendant’s anticipated Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6).

We met and conferred with Plaintiff’s counsel to discuss a proposed briefing schedule. We respectfully propose that the Court enter the following schedule for the amendment of the Complaint and any subsequent motion to dismiss:

- A. Plaintiff to file his Amended Complaint on or before August 8, 2025;
- B. Defendants shall file their Answer or their Motion to Dismiss on or before August 29, 2025;
- C. If Defendants file a Motion to Dismiss, Plaintiff shall file opposition to same on or before September 19, 2025; and
- D. Defendants shall file their reply papers on or before October 3, 2025

We thank the Court for its continued courtesies.

Respectfully submitted,  
Kaufman Dolowich LLP



Aaron N. Solomon

cc: All counsel of record (via ECF)